

STATE OF MARYLAND

* NO. C-10-CR-21-000535

v.

* IN THE CIRCUIT COURT FOR

CM

NORRIS BERNARD ELLIS

* FREDERICK COUNTY, MD

**STATE'S CONSENT MOTION FOR PROTECTIVE ORDER
OF BODY-WORN CAMERA FOOTAGE**

Pursuant to Maryland Rule 4-263(m)(1), the State, by and through Tammy M. Leache, Assistant State's Attorney for Frederick County, Maryland, hereby requests that this Court enter a Protective Order restricting disclosure of body-worn camera footage for the following reasons:

1. Body-worn camera footage obtained by police during investigations and arrests are of a highly sensitive nature, and release of the footage may jeopardize the safety of witnesses, unduly publicize evidence before trial, and infringe upon the privacy of individuals shown on the camera.
2. The State believes that body-worn camera footage should not be made available to the Defense without the issuance of a Protective Order designed to safeguard against unnecessary or public disclosure of this highly sensitive material.
3. The State requests that the Court issue an Order limiting the disclosure of the body-worn camera footage to the parties and their counsel for trial preparation and courtroom use, while prohibiting further disclosure of the footage.
4. To prevent further disclosure, the State requests that the Court order that Defense counsel not provide a copy of the body-worn camera footage to the Defendant, but allow counsel to view the footage with the Defendant during case preparation.
5. That Isabelle Raquin, Esquire, Attorney for the Defendant, consents to this Motion for Protective Order of Body-Worn Camera Footage.

WHEREFORE, the State respectfully requests this Honorable Court enter a Protective Order limiting access to the body-worn camera footage to the parties and their attorneys for use only in the above-captioned case and otherwise prohibiting further disclosure of the footage.

A proposed Order is attached.

Tammy M. Leache /s/
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CERTIFICATE OF SERVICE

I HEREBY certify that on this 21st day of January, 2022, a copy of the foregoing State's Motion for Protective Order of Body-Worn Camera Footage was sent via MDEC and/or Sharefile/Citrix, a secure file sharing service, to the designated e-mail address and/or service contact for Isabelle Raquin, Esquire, Attorney for the Defendant herein.

Tammy M. Leache /s/
TAMMY M. LEACHE
ASSISTANT STATE'S ATTORNEY